

EXHIBIT C

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TREMONT SECURITIES LAW, STATE LAW AND INSURANCE LITIGATION	: MASTER FILE NO.:
	: 08 CIV. 11117 (TPG)
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This Document Relates To:	:
	:
Insurance Actions, 09 Civ. 557 (TPG)	:
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**DECLARATION OF ROBERT FRYD IN
SUPPORT OF PETITION FOR AN AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

I, ROBERT FRYD, declare as follows:

1. I am a member of the law firm of Warshaw Burstein Cohen Schlesinger & Kuh, LLP. I submit this declaration in support of my firm's application for an award of attorneys' fees in connection with services rendered in this case, as well as the reimbursement of expenses incurred by my firm in connection with this litigation.

2. My firm represents Milton Klein, who is the trustee of The Harriet Rutter Klein Revocable Trust and the Matthew L. Klein Irrevocable Trust, each of which is a named plaintiff in the consolidated Insurance Actions. The tasks undertaken by my firm, in general terms, consisted of the following: consultations with Mr. Klein concerning his losses and possible claims; review of each Trust's relevant documentation; review and analysis of claims, pleadings, etc. in related cases; factual and legal research in connection with the claims and possible claims; consultation and coordination with attorneys from Wolf Haldenstein Adler Freeman & Herz LLP (co-lead counsel for the class in the Insurance Actions); and advice, consultations, and coordination with Mr.

Klein concerning various matters (including review of draft complaints; review of other papers filed in the action; review and analysis of settlement proposals; etc.).

3. I spent a total of 28.4 hours on this litigation and my current hourly billing rate is \$550. In addition, Donna M. Levinsohn, Counsel at this firm, spent a total of 9.1 hours, and her current hourly billing rate is \$390. Finally, Leonard S. Schindler, Managing Clerk of this office, spent .8 hours on this matter, and his current hourly billing rate is \$210. Thus, my firm's lodestar in representing Mr. Klein and the Trusts in this litigation is \$19,337. In addition, my firm has incurred a total of \$816.39 in expenses in connection with the prosecution of this litigation, which are reflected on the books and records of my firm.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this 4th day of May, 2011, in New York, New York.


ROBERT FRYD